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Public Utility District No. 1 of Douglas County

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April 24, 2007

Honorable Kimberly D. Bose, Secretary Federal Energy Regulatory Commission 888 First Street, NE Washington DC 20426

Subject: Wells Hydroelectric Project No. 2149-131

Licensee Response to Stakeholder Comments on Scoping Document 1

and Stakeholder Comments on the Pre-Application Document

Dear Secretary:

The Public Utility District No. 1 of Douglas County, Washington (Douglas PUD), licensee of the Wells Hydroelectric Project (Wells Project), hereby submits response comments to stakeholder comments on Scoping Document 1 (SD1) and the Pre-Application Document (PAD).

To date a total of ten stakeholder comment and/or study request letters were filed with the Federal Energy Regulatory Commission (FERC) by the April 2, 2007 deadline. Entities filing comments and/or study requests included the following: City of Pateros (2), Betty Wagoner (1), Friends of Fort Okanogan (1), Washington Department of Ecology (1), City of Brewster (1), Washington State Department of Fish and Wildlife (1), FERC (1), Department of Interior (DOI) – United States Fish and Wildlife Service (1) and DOI – Bureau of Indian Affairs (1). These letters included a variety of comments on SD1, the PAD and contained numerous references to proposed protection, mitigation and enhancement (PME) measures. Several of the letters received by the April 2nd deadline included informal requests for additional information but only one letter, filed by the City of Pateros, included a formal ILP study request that attempted to address FERC's seven study request criteria per 18 CFR § 5.9.

Douglas PUD has reviewed each of the letters received and has prepared the following response to stakeholder's comments on SD1 and the PAD. Douglas PUD will respond to the one (1) stakeholder study request and the various information requests in our Proposed Study Plan Document (PSP) that will be filed with FERC by the May 17, 2007 deadline.

Douglas PUD Response to Stakeholder Comments on SD1

During our review of the ten stakeholder letters commenting on various aspects of SD1, Douglas PUD identified several statements that require a formal response. We request that FERC consider our response in preparing Scoping Document 2 (SD2).

United States Fish and Wildlife Service

On March 30, 2007 the United States Fish and Wildlife Service (USFWS) submitted comments to Douglas PUD, copying the FERC, regarding the Notice of Intent to File License Application for New License, Pre-Application Document; Commencement of Licensing Proceeding; Scoping; Soliciting Comments on the Pre-Application Document and Scoping Document; Study Requests for the Wells Hydroelectric Project.

Douglas PUD appreciates the support and active participation by the USFWS during the ongoing Resource Work Group (RWG) process. Their participation in this process has led to a well defined package of twelve proposed study plans that will be used to broaden our collective understanding of the effects of the Wells Project on natural resources.

We provide the following response to the USFWS comments related to FERC's SD1.

On page 7 of the March 30, 2007 letter, the USFWS states:

B. 4.2.1 Aquatic Resources (page 13). The Commission presented a preliminary list of environmental issues to be addressed that include, "Effects of the project on water temperature, dissolved oxygen, pH and turbidity." The Service recommends that this environmental issue include an examination of aquatic habitat temperatures situated along the fringes of the Wells Reservoir. Accordingly, this environmental issue would be rephrased to read as follows: "Effects of the project on water temperature (i.e., including aquatic habitats located along the fringes of the Wells Reservoir), dissolved oxygen, pH, and turbidity."

Douglas PUD would like to point out that the aquatic habitats on the fringes of a river are a product of natural and impounded river processes. These habitats are available not only in reservoir systems, but in the reaches of many natural, unimpounded river systems. Temperature and other water quality parameters within these aquatic habitats, in both unimpounded and impounded river reaches, are governed by similar factors making it very difficult to quantify the level of Project effect on localized temperatures.

While reservoir "fringe" temperatures may vary slightly from reservoir mean temperature, this would be expected to occur an any natural system and does not in and of itself constitute a problem, or lead to a conclusion of adverse effects to aquatic life. In fact, Douglas PUD found no such connection, and, to the contrary, found a robust and native dominated aquatic ecosystem in the reservoir.

Douglas PUD agreed, in the Aquatic RWG process, to conduct a water temperature study that will look at the macro effects of the Wells Project on water temperature. Douglas PUD is not aware of an accurate tool for collecting and modeling the project's effect on water temperatures in reservoir shoreline micro or fringe habitats.

Due to all the points raised above, Douglas PUD believes that the scope of the Environmental Assessment (EA) should not be broadened to require an additional analysis of the Project's potential effect on water temperatures in reservoir shoreline habitats. There is no evidence of a Project effect, nor is there any basis to assume a Project impact, on aquatic resources due to this issue. Douglas PUD recommends that FERC maintain the existing language, contained within SD1, and utilize this same language in SD2.

Washington Department of Fish and Wildlife

On March 30, 2007 the Washington Department of Fish and Wildlife (WDFW) submitted comments to FERC related to the PAD, SD1 and Study Requests for Douglas PUD's Wells Hydroelectric Project.

Douglas PUD has enjoyed a positive working relationship with WDFW for many years. This relationship includes cooperating on the Wells Habitat Conservation Plan (HCP), the operation and evaluation of Douglas PUD's hatchery programs, funding WDFW to operate the six units of the Wells Wildlife Area and raising resident rainbow trout for stocking in regional lakes.

We greatly appreciate WDFW's supportive comments related to the PAD's identified issues, Issues Determination Statements and twelve proposed studies. We also greatly appreciate their active and thoughtful participation during the RWG process. Their participation in the RWGs has led to a well defined package of twelve proposed study plans that will be used to broaden the understanding of the effects of the Wells Project on natural resources.

We provide the following comments to FERC concerning WDFW's recent comments related to the scope of SD1.

On page 3 of the March 30, 2007 letter, WDFW states:

B. 4.1.2 Geographic Scope.

2. The upstream extent of the Wells Project boundary is the State Hwy. 17 Bridge crossing of the Columbia River at Bridgeport, Washington, which is also the lower end of the tailrace of Chief Joseph Dam. To the extent Wells Project operations affect tailrace conditions upstream of the Hwy. 17 Bridge, the geographic scope for aquatic resources should extend upstream into the Chief Joseph Dam tailrace.

Douglas PUD would like to point out that the existing Wells Project boundary already includes those portions of the Columbia River affected by the Wells Project. The Wells Project does not include the tailrace of Chief Joseph Dam because that portion of the Columbia River is primarily controlled and influenced by Chief Joseph Dam. We recommend that FERC retain the geographic scope as previously identified within SD1.

On page 5 of the March 30, 2007 letter, WDFW states:

C. 4.2 Resource Issues.

4.2.1 Aquatic Resources

1. Effects of the Project, and other hydroelectric project operations in the mid-Columbia River region, on water temperature, dissolved oxygen, pH, and turbidity within the Project boundary. WDFW Comment: WDFW recommends the issue statement be reworded as represented by the bold font and strikeout. Project water temperature is a subject of great environmental significance and should be addressed as a primary, stand-alone issue. Evaluation of the Wells Project contribution to adverse temperature conditions in the mid-Columbia River reach should be assessed in a regional geographic scope. Additionally, the study proposed by the PUD in the PAD (section 6.3.1.6), Development of a Water Temperature Model Relating Project Operations to Compliance with the Washington State and EPA Water Quality Standards is a necessary study and should be included in the scope of the 2-year Integrated Licensing Process (ILP) study period as proposed.

Douglas PUD recognizes the environmental significance of addressing water temperature as it relates to project effects on water quality within the Wells Project. Douglas PUD has included four proposed study plans, collaboratively developed within the Aquatic RWG (Douglas PUD and stakeholders), to address water quality issues within the Wells Project.

We agree that it is important to be able to distinguish the effects of upstream hydroelectric projects (and other human induced impacts), from the effects of the Wells Project when evaluating whether numeric standards for temperature are met at the Project. However, the addition of the language "and other hydroelectric project operations in the mid-Columbia River region" implies that it is the responsibility of Douglas PUD to analyze and account for potential effects on water temperature resulting from not only the operation of the Wells Project, but also the operations of numerous other mid-Columbia River projects. The intent of the scoping process is to evaluate the potential effects of only Wells Dam. Toward this end, the scope of Douglas PUD's proposed water temperature study was specifically designed to assess the effects of the operation of the Wells Project on water temperature. To accomplish this goal, Douglas PUD will have to establish the effect that incoming water temperatures have on the water quality of the Wells Project. However, it cannot be within the scope of Douglas PUD's modeling to evaluate other hydro projects in the mid-Columbia region.

The results of Douglas PUD's study will be used to evaluate its compliance with the applicable state and federal water quality standards. Information gathered from this study can certainly be utilized in other forums, with a larger geographic scope than the Wells Project; however, it is not Douglas PUD's responsibility to evaluate the effects of other hydroelectric projects or other human activities, including those upstream or downstream of Wells Dam, on water temperatures in the Columbia River.

We recommend that FERC retain the original language found within SD1 that includes an analysis of the, "Effects of the project on water temperature, dissolved oxygen, pH and turbidity". We also encourage FERC to approve the four water quality study plans, including the study plan to evaluate the effect of the Wells Project on water temperatures in the mid-Columbia River.

Page 5-6 of the March 30, 2007 letter from WDFW states:

C. 4.2 Resource Issues.

4.2.1 Aquatic Resources

2. Effects of the Project, and other hydroelectric project operations in the mid-Columbia River region, on dissolved oxygen, pH, and turbidity within the Project boundary. As per number 2 above, WDFW recommends this issue be added as a stand-alone issue within the scope of the Wells Project relicensing. Reservoir water dissolved oxygen content can, at least seasonally, show an inverse relationship to reservoir water temperature. It should be noted that mine and smelter effluents are discharged into the mainstem Columbia River in British Columbia.

Douglas PUD believes that WDFW's suggested new language, "and other hydroelectric project operations in the mid-Columbia River region," assigns responsibilities to Douglas PUD well beyond the scope of a traditional EA. Douglas PUD agrees with WDFW's comment that other hydro and non-hydro projects, including smelters, Grand Coulee, Canadian Storage projects and Chief Joseph all have a significant effect on the water quality of the Wells Project, including dissolved oxygen. However, we do not believe that it is appropriate for Douglas PUD to be required to conduct an analysis that would demonstrate the additive effect of these projects on the water quality of the Wells Project. We also do not believe that it is Douglas PUD's responsibility to conduct an analysis of the effects of downstream dams on compliance with the water quality standards. Douglas PUD recommends that FERC retain the original language found within SD1 related to the measurement of the project's effect on water dissolved oxygen, pH and turbidity.

On page 7 of the March 30, 2007 letter, WDFW states:

C. 4.2 Resource Issues.

4.2.1 Aquatic Resources

7. Effectiveness of the PUD's nuisance pikeminnow and avian wildlife control programs on native resident fish populations within the Project boundary controlling predation of listed salmon and steelhead juveniles and identification and evaluation of the cost and benefits of potential alternatives to the existing program. WDFW recommends you edit the wording of this issue statement as represented by the bold font and strikeout. The issue of the effectiveness of the PUD's nuisance control program to control predation on salmon and steelhead juveniles within the Project boundary is contained in the Wells HCP. WDFW believes these predator control measures aimed at reducing native pikeminnow and avian predation effects, in concert with other HCP requirements for meeting juvenile anadromous salmonid survival standards, are sufficient to address Project mortality on juvenile salmon and steelhead. As such, WDFW does not believe cost and benefit analyses of the PUD pikeminnow and avian predation control programs are necessary.

We agree with WDFW that the Wells HCP requires an effective predator control program to reduce the take of juvenile salmonids in the reservoir, tailrace and hatcheries and we concur that there is no need to conduct a cost and benefit analysis of the PUD pikeminnow and avian predation control program. However, the true intent of the proposed nuisance wildlife control study plan, developed collaboratively in the Terrestrial RWG (including WDFW and USFWS wildlife biologists), is to evaluate whether the existing nuisance wildlife control program is targeting the correct species of wildlife (birds and mammals). The study will also evaluate alternatives to the existing technologies utilized to control nuisance wildlife.

WDFW appears to be recommending that this issue be restructured to focus on pikeminnow and not on nuisance wildlife. As discussed at the Scoping Meeting on February 28, 2007, this is not an Aquatic issue but rather a Terrestrial issue related to the nuisance wildlife control study collaboratively developed by the Terrestrial RWG. We recommend that FERC retain the original language found within SD1 and the PAD proposing an analysis of the effectiveness of the nuisance wildlife control program.

On page 14 of the March 30, 2007 letter, WDFW states:

4.2.2 Terrestrial Resources

1. Whether the project transmission line represents an avian electrocution or collision hazard. This Terrestrial Resource Issue should....WDFW believes a follow-up study to investigate the effect of <u>new</u> 230 kV transmission line corridors on sage grouse and sharp-tailed grouse are necessary following their construction...

Douglas PUD is not proposing to install a new 230 kV transmission line. The existing 230 kV transmission lines, and associated right-of-way, are adequate to deliver the power generated at the Wells Hydroelectric Project to Douglas Switchyard where the power generated at Wells is connected to the northwest transmission network.

Bureau of Indian Affairs

By letter of March 30, 2007, the Bureau of Indian Affairs (BIA) submitted comments to FERC Scoping Document 1 (SD1) for the Wells Hydroelectric Project.

The BIA letter indicates that BIA would like to work with Douglas PUD to:

"...develop a strategy for quantifying Project effects (including those ongoing project effects that began during the last license term but will continue into the future) and demonstrating that those effects will be appropriately mitigated for the term of the next license."

Douglas PUD agrees that it will be important for the Environmental Assessment, as outlined and described in SD1, to identify ongoing and existing project impacts, consistent with FERC's licensing guidelines¹ and case law. The SD1 as written appears consistent with prior court findings that have clearly articulated that the environment, as it exists today, is the proper baseline condition and the baseline against which FERC should consider the effects of the Project as proposed for relicensing and any alternatives.

The issue of the proper baseline against which to consider alternative measures to protect the environment has been taken up directly by two separate U. S. Courts of Appeals. In the case of American Rivers v. FERC, 201 F.3d 1186, 1195-99, (9th Cir. 2000), dealing with the Walterville and Leaburg hydro plants, the Court agreed with and upheld FERC's conclusion that "it is highly doubtful that attempts to ascertain the status of various resources prior to the time a 50-year old project was constructed would result in the development of any useful information". The Court went on to say "We believe that (FERC's) conclusion furnishes a reasonable interpretation of the FPA. It defies common sense and notions of pragmatism to require the Commission or license applicants to gather information to recreate a 50-year-old environmental base upon which to make present day development decisions."

¹ Preparing Environmental Assessments, Guidelines for Applicants, Contractors and Staff, FERC, March 2001; Handbook for Hydroelectric Project Licensing and 5 MW Exemptions from Licensing. FERC, April 2004.

Similarly, in the case of Conservation Law Foundation v. FERC, 216 F.2d 41, 46 (D.C. Cir. 2000), wherein the main argument of the petitioners was that FERC should not have treated existing conditions as the baseline option because this caused "the Commission to ignore ongoing impacts directly attributable to the new license," the Court found that for FERC to properly perform its environmental obligations under the FPA, the "Commission must compare what might occur to fish and wildlife if the license does not include protection for nonpower resources against what will occur with conditions imposed." The Court agreed with FERC's approach of using existing conditions as the baseline, stating further that "it hardly follows that the Commission must imagine the (project area) as it existed before 1899 and assess the effect of relicensing by pretending that the (project dam) does not exist -- at least when no one advocates decommissioning the (project) and tearing down the dam."

Therefore, Douglas PUD's approach to assessing project effects has been directed specifically at describing the existing (baseline) project-related environment and assessing the beneficial and adverse effects that the Wells Project and its continued operation would have on environmental resources. Thus far, the baseline (existing) relicensing studies conducted by Douglas PUD and the studies collaboratively developed and proposed in the PAD by the RWGs, for completion during the ILP study period, have specifically avoided conducting or proposing studies directed at characterizing resources that existed prior to the original licensing and construction of the project.

On page 3 of BIA's March 30, 2007 letter, it states:

- 9. Page 16, Aquatic Resources, lamprey: The Environmental Analysis should also estimate the amount and type of historic lamprey habitats in the project area to help define appropriate sideboards for potential mitigation measures.
- 10. Page 16, Aquatic Resources, sturgeon: The Environmental Analysis should similarly discuss historic sturgeon habitat and address potential measures to mitigate Project impacts to sturgeon.

We recommend that FERC not include a requirement within the scoping document that Douglas PUD prepare an analysis of pre-project habitat for lamprey, sturgeon or any other resources that were impacted during the construction of the Wells Project. It is clear that the existing baseline condition is the baseline against which the licensee is required to measure the environmental benefits and effects of the ongoing operation of the project, including any proposed alternative relicensing actions.

Douglas PUD Response to Stakeholder Comments on PAD

City of Brewster

On March 30, 2007, the City of Brewster (Brewster) submitted comments to FERC related to the PAD for the Wells Hydroelectric Project.

Douglas PUD has enjoyed a positive working relationship with Brewster since the start of the RWG process in 2005. We have also enjoyed a positive relationship with Brewster during the implementation of past Recreation Action Plans. We appreciated Brewster's active participation during the RWG process and look forward to working closely with the city throughout relicensing and the next license term.

We provide the following comments to FERC related to Brewster's recent comments to the PAD for the Wells Project.

Page 3, No. 8: The Recreation Use Assessment was inadequate

The City of Brewster states that the Recreation Use Assessment did not include well attended events, avoided peak usage times, Spanish-speaking recreationists were not approached, and that waterfowl hunting seasons were not adequately addressed.

Douglas PUD believes that these statements are not an accurate reflection of the professionally conducted and published Recreational Use Assessment conducted in 2005.

Regarding major events and peak usage, the Recreation Use Assessment was not a study of "events", but rather a survey of public use at Wells Project facilities. The goal of the study was to describe use levels, preferences, attitudes, and characteristics of the primary recreation user groups within the Wells Project. Significant effort was made to have surveyors present during times of peak use, including major holiday weekends. Surveys were conducted during Memorial Day weekend, Apple Pie Jamboree, Independence Day weekend, opening day of salmon fishing, and Labor Day. In addition, Douglas PUD conducted supplemental surveys in 2006 including Apple Pie Jamboree, hydroplane races, and whitewater rafting takeout locations in the lower Methow River. This supplemental data will be utilized in the Recreation Needs Analysis which, if approved by FERC, will be conducted as part of the ILP.

Regarding Brewster's comment that Spanish-speaking recreationists were not adequately represented in the survey, it should be noted that there were only seven people out of 360 who chose not to participate in the survey because they did not understand English. At least one person on each survey team spoke some Spanish, and was able to communicate enough to assist with completing the survey. In addition, the percentage of Hispanic respondents surveyed, compared to all other local respondents surveyed (Okanogan and Douglas Counties only), was 15.2 percent, which is slightly higher than the 2000 Census estimation for the two-county area (12.5%).

Regarding waterfowl hunting season, the survey strategy included fall surveys including the month of December. All access points were surveyed, including the Wells Wildlife Area, which is the most popular hunting area along Wells Reservoir.

City of Pateros

The City of Pateros (Pateros) submitted a letter to FERC on April 2, 2007 providing comments related to the PAD for the Wells Hydroelectric Project.

Douglas PUD has had a long and productive relationship with Pateros beginning in the early 1980's with the two-foot pool raise and continuing into the current Recreation Action Planning Process and RWGs that were started in 2005. We appreciate the active participation by Pateros during the RWG process. Their participation in the RWGs has lead to a well defined package of twelve proposed study plans that will be used to broaden our existing understanding of the effects of the Wells Project on natural and social resources.

We provide the following comments to FERC related to Pateros's recent comments to the PAD for the Wells Project.

Exhibit A, Comments under Section 5.6.4: Recreation Use Survey

5.6.4 Current Recreational Use and Resource Capacity

<u>Pateros' Comment:</u> The current Recreation Visitor Use Assessment has limitations and should not be used as the primary document for visitor use on the Wells Project. These kinds of surveys do not measure use this is not provided....

In addition, Pateros states that DTA's (2006) Recreation Visitor Use Survey should have included all activities in the project area, not just water activities. Douglas PUD would like to clarify that the Recreation Visitor Use Survey was specifically designed to study existing use within the Wells Project boundary. The notion that Douglas PUD should conduct a study that evaluates all potential recreational uses that could theoretically be provided is not only an impossible task, but it is beyond the scope of Douglas PUD's responsibilities for relicensing. The Recreation Visitor Use Assessment documented all types of activities taking place on Project lands and waters. These activities were both water and land based, including boating, fishing, picnicking, hiking, camping, bicycling, wildlife viewing, hunting, horseback riding, and relaxing.

Douglas PUD is proposing to utilize the Recreation Visitor Use Assessment as the primary documentation for visitor use within the Wells Project boundary. It is the most definitive, current and accurate assessment of visitor use and recreation demand for the Wells Project.

USFWS

We provide the following comments to the USFWS letter related to their comments on the PAD.

On page 2 of the March 30, 2007 letter, the USFWS states:

"...we recommend that all appropriate study plans include at least a 2-year timeframe in which to collect baseline data."

Douglas PUD would like to point out that each of the proposed study plans contains a detailed schedule for the completion of field activities, data analysis and report writing. The study schedules were developed by the RWGs and reflect careful consideration of the logistics of field sampling and the behavior and biology of the resource being studied. Some of the proposed study plans are proposed to cover a two-year timeframe while others have been proposed as one-year studies.

We recommend that any decision regarding the need to extend a proposed one-year study into a two-year study be made only after the results of that study have been provided in the Initial Study Report and rational for a second year have been discussed. Only then can an informed decision be made regarding the appropriateness of a second year of study.

On page 6 and 7 of the March 30, 2007 letter, the USFWS refers, in parts B, C and F, to:

"...sediment flushing operations at the Methow River confluence..."

Douglas PUD would like to offer some additional clarification on this issue. Daily operations of the Wells Project generally result in reservoir elevation fluctuations of one to two feet. During the past five years of operation, the daily fluctuation frequency of the reservoir was less than three feet 93.3% of the time and minimum elevations fell below 777 feet (four feet) only 3.8% of the time. Infrequent reservoir operations resulting in fluctuations over four feet in a 24 hour period have occurred only 1.1% of the time. In the last 15 years (1990-2005), the forebay maintained a minimum water surface elevation of at least 777 feet 95.1% of the time and infrequent reservoir operations occurred only 0.8% of the time.

When intense precipitation or rapid snowmelt increases inflow from the Methow River, the project is operated at a lower reservoir elevation to help reduce the potential build-up of deltatype deposits which might affect localized water levels and environmental resources. Under these conditions, Methow River flows will keep sediment moving from the lower Methow River.

The Terrestrial RWG addressed this issue in Section 6.4.3.3 of the PAD. The Terrestrial RWG concluded that the existing operating scenario has resulted in high quality macrophyte beds, which are vital to overwintering waterfowl, and also benefit bald eagles and waterfowl hunting. The Resource Work Group also noted that the wildlife conditions in the reservoir have evolved under the existing operating regime, including riparian and wetland habitat, and that reservoir fluctuations would only become an issue if the operating regime were to change in the future. Douglas PUD is not proposing to change reservoir operations under the new license.

If you have any questions related to Douglas PUD's comments contained within this letter, please feel free to contact me at (509) 884-7191.

Sincerely,

Shane Bickford

Supervisor of Relicensing

Cc: Relicensing Distribution List

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